

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SONRAI MEMORY LIMITED,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 6:21-cv-00167-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

LG ELECTRONICS INC., LG
ELECTRONICS U.S.A., INC.,

Defendants.

Case No. 6:21-cv-00168-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 6:21-cv-00169-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

DELL TECHNOLOGIES INC.,

Defendant.

Case No. 6:21-cv-00361-ADA

SONRAI MEMORY LTD.,	
Plaintiff,	
v.	Case No. 6:21-cv-401-ADA
APPLE INC.,	
Defendant.	
SONRAI MEMORY LIMITED,	
Plaintiff,	Case No. 6:21-cv-00167-ADA
v.	
KINGSTON TECHNOLOGY COMPANY, INC. and KINGSTON TECHNOLOGY CORPORATION	
Defendant.	

**DECLARATION OF SUMIT RAY IN SUPPORT OF
DEFENDANTS' OPPOSED MOTION TO STAY
PENDING FINAL RESOLUTION OF PLAINTIFF'S MANUFACTURER LAWSUITS**

I, Sumit Ray, hereby declare as follows:

1. I am over 18 years of age and competent to make this declaration.
2. I have been employed at a subsidiary of Dell Technologies Inc. ("Dell") since 2008. My current position at Dell is Vice President of Worldwide Procurement. In this role, my responsibilities include sourcing and procurement of SSDs, NAND flash components, hard drives, and the like from various suppliers.

3. I provide this declaration on behalf of Dell with respect to *Sonrai Memory Ltd. v. Dell Technologies Inc.*, Case No. 6:21-cv-00361-ADA. The statements in this declaration are based on my personal knowledge, my review of corporate records maintained by Dell in the ordinary course of business, and/or my discussions with Dell employees. If called to testify as a

witness, I could and would testify competently and truthfully to each of the statements under oath.

4. I understand, based on the complaint and its attachments, that the plaintiff has filed a lawsuit against Dell claiming that certain Dell products that include SanDisk/Toshiba 64L 3D NAND flash chips infringe U.S. Patent Nos. 6,724,241 (the “‘241 patent”) and U.S. Patent No. 7,436,232 (the “‘232 patent”). Plaintiff alleges that SanDisk/Toshiba 64L 3D NAND flash chips with the die identifier FRN1256G (“Accused Kioxia and Western Digital Chips”) infringe the ’241 and ’232 patents.

5. I further understand, based on the complaints and attachments to the complaints, that plaintiff has filed lawsuits against Kioxia Corporation (formerly Toshiba Memory Corporation) and Kioxia America, Inc. (collectively, “Kioxia”) and Western Digital Technologies Inc. and Western Digital Corporation (“Western Digital”) of infringing the ’241 patent based on the Accused Kioxia and Western Digital Chips.

6. Kioxia and Western Digital supply the Accused Kioxia and Western Digital Chips to Dell. Kioxia and Western Digital are the only sources of the Accused Kioxia and Western Digital Chips to Dell.

7. Dell does not have the ability to make any modifications to the circuits of the Accused Kioxia and Western Digital Chips accused of infringing the ’241 and ’232 patents and Dell integrates into the Dell products the Accused Kioxia and Western Digital Chips “as is” with respect to their circuit designs.

8. Dell does not have possession, custody, or control of the factual information and related documentation that shows the design, manufacture and operation of the accused circuitry of the Accused Kioxia and Western Digital Chips.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 21, 2021 in the Republic of Singapore.

/s/ Sumit Ray
Sumit Ray